

Exhibit 1



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July 5, 2016

**CONFIDENTIAL SETTLEMENT DOCUMENT
SUBJECT TO CONFIDENTIALITY AGREEMENT
AND FED. R. EVID. 408**

VIA OVERNIGHT MAIL

MaryAnn Moore, Esq.
Deputy General Counsel
Vice President of Legal Affairs
Mednax Services Inc.
1301 Concord Terrace
Sunrise, FL 33323

Re: Aetna/Mednax Paid Claim History

Dear MaryAnn:

As we discussed, enclosed is the paid claims history file. The thumb drive is encrypted, zipped and password protected. I will send you via email the passcode. We would like to schedule a brief call later this week to explain this data set to whomever is going to do the analytic review. Please let me know when you would like to schedule that call.

Additionally, later this week we will be sending you the regression analysis. As we discussed, we believe it is important in moving the process forward to promptly schedule a face-to-face meeting with the people who will be reviewing the analysis. We are proposing we meet on either July: 19, 20 or the 21st. Please let me know what might work.

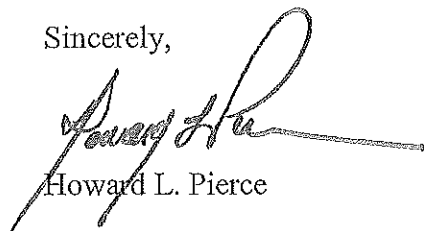
Both Aetna and Mednax are subject to Federal Regulations promulgated under the Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") including the standards for privacy of individually identifiable health information set forth in 45 C.F.R. Parts 160 and 164, (the "Privacy Rules"). Therefore, both parties shall keep Protected Health Information ("PHI") strictly confidential and shall not use or disclose the attached PHI except as required by law.



MaryAnn Moore, Esq.
July 1, 2016
Page 2

As always, if you have any questions or comments please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, which appears to read "Howard L. Pierce", is written over the printed name. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Howard L. Pierce

HLP/cj

Enclosure



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November 2, 2016

**CONFIDENTIAL SETTLEMENT DOCUMENT
SUBJECT TO THE CONFIDENTIALITY AGREEMENT
AND FED. R. EVID. 408**

VIA OVERNIGHT MAIL

Mary Ann E. Moore, Esq.
Chief Legal Officer – Eastern/Western Divisions
Mednax Health Solutions Partner
1301 Concord Terrace
Sunrise, FL 33323

Re: Aetna/Mednax Paid Claims Data And Analysis

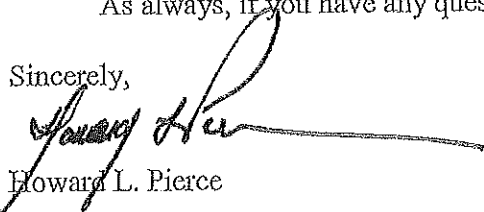
Dear Mary Ann:

I write in response to our recent exchange of emails concerning the accurate receipt at Mednax's FTP site of Aetna's paid claims and data analysis. In an attempt, to both address and alleviate this situation, as well as, move the process forward, I am enclosing an encrypted/ password protected thumb drive. It contains all of the claim data, analysis and information previously sent to the FTP site. I will plan on emailing you with the password information tomorrow morning.

As you are aware, both Aetna and Mednax are subject to Federal Regulations promulgated under the Administrative Simplification provisions of the Health Insurance Portability and Accountability act of 1996 ("HIPAA") including the standards for privacy of individually identifiable health information set forth in 45 C.F.R. Parts 160 and 164, (the "Privacy Rules"). Therefore, both parties shall keep PHI strictly confidential and shall not use or disclose the attached PHI except as required by law.

As always, if you have any questions or comments please do not hesitate to contact me.

Sincerely,



Howard L. Pierce

Enclosure

Howard Pierce

From: Howard Pierce
Sent: Thursday, December 22, 2016 3:19 PM
To: 'MaryAnn Moore'
Subject: RE: Meeting 12/21

Confidential

Mary Ann: Just a quick note to answer your questions on time and location of the 1/19 meeting and to provide Aetna's expectations on the state of your data analysis when we meet. As we discussed, we plan on getting started at 11:00 a.m. at Aetna's Hartford office.

On 10/1, we overnighted you a thumb drive copy of the data analysis after suspecting that part of data problem, up to that point, was your FTP site itself. You reported receipt of it and that you were finally making some progress. Even after the receipt of the 10/1 data, there was some confusion on Ethan's part on which set of data to use, which has now been resolved after we made a complete resend (via email) of the 10/1 analysis last week.

In order to have a meaningful meeting, it is imperative that Ethan completes his analysis before 1/19. As I'm sure you will agree, the purpose of the meeting is to discuss the substance of our claims. We do not want to spend time at the meeting discussing the mechanics of downloading or retrieving the data. Therefore, between now and the meeting if Ethan has any problems or questions dealing with the data analysis please let us know...sooner rather than later because Aetna will not allow us to adjourn this meeting.

As always, if you have any questions please let me know.

Happy Holidays!
Thanks, Howard



Howard L. Pierce
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Exhibit 2



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Page 1 of 2

September 1, 2016

CONFIDENTIAL
VIA EMAIL AND FIRST CLASS MAIL

MaryAnn E. Moore, Esq.
Chief Legal Officer – Eastern/Western Divisions
MEDNAX Health Solutions Partner
1301 Concord Terrace
Sunrise, FL 33323

Re: Aetna – Regression Data Analysis

Dear MaryAnn,

I write as a follow-up to our phone conversation with John Bowblis, Dan Sandoval, and Ethan Cohen-Cole last Friday, and also in response to your email sent yesterday asking about getting you “the missing data.”

Just to be clear, there is no missing data. All the data that the regression analysis was based on was provided in the spreadsheet “Regression Data Layout.xlsx” along with detailed instructions provided on August 5. We also provided the code to run against the data once it was imported into the database of your choosing, which was marked by letter and number.

In any event, as you requested on our phone call, we will be giving you all the related data and code preloaded in a database so that your consultants will not have any further questions as to how to bring in the data and how to run the code. It will, as we said on the call, require just one click of a button. We will have this to you by the end of this week.

Regarding your request for patient identifying information, our regression analysis does not depend on individual case histories, but is based entirely on data and statistics over a large number of providers, patients, and years, as well as witness testimony. If Mednax is not prepared to accept the premise that a claim based on a statistical analysis without reference to specific patients is valid, then Aetna believes this pre-litigation business-to-business effort to be futile. If, however, Mednax is merely looking to validate that our regression analysis used the proper universe of patients and accounted for anomalies like multiple births, etc., as Ethan suggested during our phone conversation, we will provide a patient identifying approach in our data transfer email later this week. Please advise us in this regard.



MaryAnn E. Moore, Esq.
September 1, 2016
Page 2 of 2

Aetna remains interested in engaging in a principled, good faith approach designed to reach a negotiated resolution between business partners so as to avoid litigation regarding these overpayment issues. I trust Mednax is also interested in moving this process forward. We are available for any further questions you or your consultants may have once you receive our information.

Sincerely,

A handwritten signature in dark ink, which appears to read "Howard L. Pierce", is written over the word "Sincerely,". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Howard L. Pierce

Exhibit 3



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Page 1 of 2

November 28, 2016

**CONFIDENTIAL SETTLEMENT DOCUMENT
SUBJECT TO THE CONFIDENTIALITY AGREEMENT
AND FED. R. EVID. 408**

VIA OVERNIGHT MAIL

Maryann Moore, Esq.
Chief Legal Officer – Eastern/Western Divisions
Mednax Health Solutions Partner
1301 Concord Terrace
Sunrise, FL 33323

Re: Requested Aetna/Mednax Patient Identification Information

Dear Mary Ann:

I write to provide Mednax with its requested Aetna paid claims patient identification information. The information is enclosed on an encrypted/password protected thumb drive. I will plan on emailing you the password information tomorrow morning.

The thumb drive is divided into six files. They are as follows:

- 1) Aetna patient data files:
MEDNAX_C25_DETAIL_REPORT.xlsx
- 2) Aetna patient data file:
MEDNAX_HNO.xls
- 3) Aetna patient data file:
MEDNAX_TRAD.xlsx
- 4) SQL code file to create tables to hold the patient data:
Step 1 – Create Tables.sql
- 5) SQL package that imports the patient data:
Step 2 – Mednax_Patients.dtsx
- 6) SQL code file that merges the patient data with the original dataset:
Step 3 – Populate Fields.sql



Mary Ann Moore
November 28, 2016
Page 2 of 2

As you are aware, both Aetna and Mednax are subject to Federal Regulations promulgated under the Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") including the standards for privacy of individuality identifiable health information set forth in 45 C.F.R. Parts 160 and 164, (the "Privacy Rules"). Therefore, both parties shall keep PHI strictly confidential and shall not use or disclose the attached PHI except as required by law.

As always, if you have any questions or comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard L. Pierce", is written over a horizontal line. The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Howard L. Pierce

Enclosure

Exhibit 4

Aimee L. Kumer

From: Mark Schwemler
Sent: Tuesday, March 12, 2019 3:45 PM
To: Jonathan E. Feuer; Gregory S. Voshell; Aimee L. Kumer; Fred Santarelli
Cc: Jennifer Barrett; Luke Nikas; Michael Carlinsky; rfeltoon@conradobrien.com; agarden@conradobrien.com; hklein@conradobrien.com; Martin Goldberg; Rosy Diaz; Lorelei Van Wey; Haydrich Estrada; Michael Pemstein; Dominic Pody
Subject: RE: Aetna, et al. v. Mednax, et al., Case No. 18-cv-2217 (E.D. Pa.) - Former Mednax Employees

Jon:

With regard to former Mednax employees referenced in Paragraph 41 of Aetna's Complaint, they are as follows:

Peggy Corrigan Rinehart
Yolanda Givens
Valerie Moniaci
Elaine Mullings-Robertson
Dr. Galdino Sila-Neto
Dr. Barry Yoss

All of these individuals were interviewed before Aetna retained Dr. Makuch in anticipation of litigation, and we will be supplementing our Responses and Objections to Defendants' Interrogatory No. 5 to provide more detailed information requested in that interrogatory. We will also be providing you with any non-privileged records surrounding communications with these individuals. As previously indicated, we were assured by Mednax counsel that none of these individuals will be subject to any form of retaliation for having engaged in these communications.

Please be advised that there is one other individual who was interviewed and whose information was used in support of Aetna's Complaint, however we have now learned that this individual requested that his/her identity only be disclosed under conditions of confidentiality. We will therefore await the Court's entry of the Protective Order before that person's identity is disclosed. Hopefully Judge Beetlestone will rule soon in that regard.

What we were hoping to discuss with you yesterday is the information conveyed above, but you were likely preoccupied with the filing due yesterday. If you would like to discuss this further, we can do so after March 13, as I will be unavailable until then.

Mark J. Schwemler, Esq.
Elliott Greenleaf
925 Harvest Drive
Suite 300
Blue Bell PA 19422
215-977-1051

From: Jonathan E. Feuer [mailto:jfeuer@lashgoldberg.com]
Sent: Monday, March 11, 2019 5:08 PM
To: Mark Schwemler; Gregory S. Voshell; Aimee L. Kumer; Fred Santarelli
Cc: Jennifer Barrett; Luke Nikas; Michael Carlinsky; rfeltoon@conradobrien.com; agarden@conradobrien.com; hklein@conradobrien.com; Martin Goldberg; Rosy Diaz; Lorelei Van Wey; Haydrich Estrada; Michael Pemstein; Dominic

Pody

Subject: RE: Aetna, et al. v. Mednax, et al., Case No. 18-cv-2217 (E.D. Pa.) - Former Mednax Employees

Mark,

Aetna stated in its March 1 correspondence to the Court that Aetna is producing the names of these witnesses and that the issue is now moot. I understand that you reiterated that same sentiment during last week's call with the Court. You again state below that this information is forthcoming. More than a full week has passed since Aetna wrote that the issue is moot, but we still do not have this information and you have not even told us when we can expect to receive it. Please let us know when we will be receiving the names of these former employees, which in any event should be no later than this Wednesday, or we will be forced to immediately notify the Court that this issue is not moot.

As for a conference, we are willing to meet and confer regarding the other open issues with Aetna's responses, as well as Aetna's search terms and list of custodians. Please let us know if you are available tomorrow afternoon or Wednesday afternoon to speak. Thank you.

Lash & Goldberg LLP	Attorneys at Law
Jonathan E. Feuer	Weston Corporate Centre I 2500 Weston Road, Suite 220 Weston, Florida 33331 Phone: (954) 384-2500 Fax: (954) 384-2510
jfeuer@lashgoldberg.com	www.lashgoldberg.com

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From: Mark Schwemler <mjs@elliottgreenleaf.com>

Sent: Thursday, March 7, 2019 10:52 AM

To: Jonathan E. Feuer <jfeuer@lashgoldberg.com>; Gregory S. Voshell <gsv@elliottgreenleaf.com>; Aimee L. Kumer <alk@elliottgreenleaf.com>; Fred Santarelli <fpsantarelli@elliottgreenleaf.com>

Cc: Jennifer Barrett <jenniferbarrett@quinnemanuel.com>; Luke Nikas <lukenikas@quinnemanuel.com>; Michael Carlinsky <michaelcarlinsky@quinnemanuel.com>; rfeltoon@conradobrien.com; agarden@conradobrien.com; hklein@conradobrien.com; Martin Goldberg <mgoldberg@lashgoldberg.com>; Rosy Diaz <rdiaz@lashgoldberg.com>; Lorelei Van Wey <lvanwey@lashgoldberg.com>; Haydrich Estrada <hestrada@lashgoldberg.com>; Michael Pemstein <michaelpemstein@quinnemanuel.com>; Dominic Pody <dominicpody@quinnemanuel.com>

Subject: RE: Aetna, et al. v. Mednax, et al., Case No. 18-cv-2217 (E.D. Pa.) - Former Mednax Employees

Jon:

We will be providing you with the information that we discussed with the Court, but we don't appreciate the unilateral imposition of arbitrary deadlines. We will also be supplementing our responses and objections to Defendants' Interrogatory No. 5. Before Defendants unexpectedly sent their February 15, 2019 letter to the Court, we were in the process of attempting to confer with regard to the objections we raised as to that discovery request. We are still willing to do so. We are available Monday afternoon for that purpose, if that works on your end.

Mark J. Schwemler, Esq.
Elliott Greenleaf
925 Harvest Drive
Suite 300
Blue Bell PA 19422
215-977-1051

From: Jonathan E. Feuer [<mailto:jfeuer@lashgoldberg.com>]
Sent: Wednesday, March 06, 2019 9:46 AM
To: Mark Schwemler; Gregory S. Voshell; Aimee L. Kumer; Fred Santarelli
Cc: Jennifer Barrett; Luke Nikas; Michael Carlinsky; rfeltoon@conradobrien.com; agarden@conradobrien.com; hklein@conradobrien.com; Martin Goldberg; Rosy Diaz; Lorelei Van Wey; Haydrich Estrada; Michael Pemstein; Dominic Pody
Subject: Aetna, et al. v. Mednax, et al., Case No. 18-cv-2217 (E.D. Pa.) - Former Mednax Employees

Counsel,

In light of your representation to the Court during Monday's conference that Aetna would be providing the names of the former Mednax employees from whom it purportedly received information, please do so by no later than 1 p.m. tomorrow. In addition to the names, please provide us with all of the information requested in Interrogatory No. 5, including the date, time, manner, and substance of all of Aetna's communications with any former Mednax employees, by no later than the close of business Friday, March 7. Thank you.

Regards,
Jon

Lash & Goldberg LLP	Attorneys at Law
Jonathan E. Feuer jfeuer@lashgoldberg.com	Weston Corporate Centre I 2500 Weston Road, Suite 220 Weston, Florida 33331 Phone: (954) 384-2500 Fax: (954) 384-2510 www.lashgoldberg.com

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